

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

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In Re:

Bky File No. 12-41672 NCD  
Chapter 13

Todd Jeffrey Sassen  
Shannon Michele Sassen

NOTICE OF PRE-CONFIRMATION  
CHAPTER 13 PLAN MODIFICATION

Debtors

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TO ALL PARTIES ON THE ATTACHED SERVICE LIST:

Enclosed please find Debtors' First Pre-Confirmation Modified Chapter 13 Plan dated June 20, 2012. PLEASE TAKE NOTICE that the confirmation hearing with regard to the Modified Plan shall be held at the US Courthouse, Courtroom 7 West, 300 South Fourth Street, Minneapolis, MN 55415 on July 5, 2012 at 10:30 a.m.

Date: June 22, 2012

G. MARTIN JOHNSON, LTD.

By: /e/ G. Martin Johnson  
G. Martin Johnson (0052279)  
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**Form 3015-1 - Chapter 13 Plan**  
**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF MINNESOTA**

**FIRST PRE CONFIRMATION MODIFIED CHAPTER 13 PLAN**

In re:

**Dated: June 20, 2012**

**Todd Jeffrey Sassen**  
**Shannon Michele Sassen**

Debtor(s),

**Case No. 12-41672 NCD**

*In a joint case,  
Debtor means Debtors in this plan.*

**1. DEBTOR'S PAYMENTS TO TRUSTEE —**

- a. As of the date of this plan, the Debtor has paid the Trustee **\$1,400.00**.  
b. After the date of this plan, the Debtor will pay the Trustee **\$1,200.00 per month for 58 months, beginning June, 2012 for a total of \$69,600.00**. The minimum plan length is 60 months from the date of the initial plan payment unless all allowed claims are paid in a shorter time.  
c. The Debtor will also pay the Trustee:  
d. The Debtor will pay the Trustee a total of **\$71,000.00** [line 1(a) + line 1(b) + line 1(c)], from the date of this plan.

**2. PAYMENTS BY TRUSTEE --** The Trustee will pay from available funds only creditors for which proofs of claim have been filed. The Trustee may collect a fee of up to 10% of Plan payments, or **\$7,100.00** [line 1(d) x .10].

**3. ADEQUATE PROTECTION PAYMENT [§1326(a)(1)(C)] —** The Trustee will promptly pay from available funds adequate protection payments to creditors holding allowed claims secured by personal property, according to the following schedule, beginning in month one (1).

Creditor	Monthly Payments	Number of Months	Total Payments
a.	\$		\$
b.	\$		\$
c. Total	\$		\$

**4. EXECUTORY CONTRACTS AND UNEXPIRED LEASES [§365] —** The Debtor assumes the following executory contracts or unexpired leases. Cure provisions, if any, are set forth in §7.

Creditor	Description of Property
a.	
b.	

**5. CLAIMS NOT IN DEFAULT —** Payments on the following claims are current and the Debtor will pay the payments that come due after the date the petition was filed directly to the creditors. The creditors will retain liens, if any.

Creditor/Claim	Creditor/Claim
a.	
b.	
c.	

**6. HOME MORTGAGES IN DEFAULT [§1322(b)(5) and §1322(e)] —** The Trustee will cure defaults on the following claims secured only by a security interest in real property that is the Debtor's principal residence. The Debtor will pay the payments that come due after the date the petition was filed directly to the creditors. The creditors will retain liens. All following entries are estimates. The Trustee will pay the actual amounts of default.

Creditor	Amount in Default	Monthly Payments	Beginning in Month #	Number of Payments	Total Payments
a.	\$				\$
b.	\$				\$
c.					
d.					
Total:					\$

**7. CLAIMS IN DEFAULT [§ 1322 (b) (3) and (5) and § 1322 (e)]-** The trustee will cure defaults on the following claims as set forth below. The Debtor will pay the payments that come due after the date the petition was filed directly to the creditors. The creditors will retain liens, if any. All following entries are estimates, except for interest rate.

Creditor	Amount in Default	Int. Rate (if applicable)	Monthly Payments	Beginning in Month #	Number of Payments	Total Payments
a.	\$		\$			\$
b.	\$		\$			\$
c.	\$		\$			\$
Total:						\$

**8. OTHER SECURED CLAIMS; SECURED CLAIM AMOUNT IN PLAN CONTROLS [\$1325(a)(5)]** — The Trustee will pay, on account of the following allowed secured claims, the amount set forth in the "Total Payments" column, below. The creditors will retain liens securing the allowed secured claims until the earlier of the payment of the underlying debt determined under nonbankruptcy law, or the date of the Debtor's discharge. NOTWITHSTANDING A CREDITORS PROOF OF CLAIM FILED BEFORE OR AFTER CONFIRMATION, THE AMOUNT LISTED IN THIS PARAGRAPH AS A CREDITOR'S SECURED CLAIM BINDS THE CREDITOR PURSUANT TO 11 U.S.C. § 1327, AND CONFIRMATION OF THE PLAN IS A DETERMINATION OF THE CREDITORS ALLOWED SECURED CLAIM.

Creditor	Claim Amount	Secured Claim	Int. Rate	Beginning in Month	(Monthly Payment)	X of Payments	= on Account of Claim	+ Protection from §3	= Total Payments
a.	\$	\$			\$		\$	\$	\$
b.	\$	\$			\$		\$	\$	\$
c.	\$	\$			\$		\$	\$	\$
d.Total									\$

**9. PRIORITY CLAIMS** — The Trustee will pay in full all claims entitled to priority under § 507, including the following. The amounts listed are estimates. The Trustee will pay the amounts actually allowed.

Creditor	Estimated Claim	Monthly Payments	Beginning in Month #	Number of Payments	Total Payments
a. Attorney Fees	\$500.00	\$500.00	1	1	\$500.00
b.Domestic Support-_____ County					
c.IRS	\$6,000.00	\$500.00	2	12	\$6,000.00
d.MN Dept. of Revenue	\$2,500.00	\$250.00	2	10	\$2,500.00
e.					\$
f. Total					\$9,000.00

**10. SEPARATE CLASSES OF UNSECURED CREDITORS** — In addition to the class of unsecured creditors specified in §11, there shall be separate classes of non-priority unsecured creditors described as follows: loan with do-debtor. The Trustee will pay the allowed claims of the following creditors. All entries below are estimates.

Creditor	Interest Rate (if any)	Claim Amount	Monthly Payments	Beginning in Month	Number of Payments	Total Payments
a.		\$	\$			\$
b.		\$	\$			
c. Total		\$				\$

**11. TIMELY FILED UNSECURED CREDITORS** —The Trustee will pay holders of nonpriority unsecured claims for which proofs of claim were timely filed, the balance of all payments received by the Trustee and not paid under ¶ 2, 3, 6, 7, 8, 9 and 10 or 11, their pro rata share of approximately **\$54,900.00** [line 1(d) minus lines 2, 6(d), 7(d), 8(d), 9(f), and 10(c)].

a. The Debtor estimates that the total unsecured claims held by creditors listed in ¶ 8 are \$ 0.00.

b. The Debtor estimates that the Debtor's total unsecured claims (excluding those in § 8 and § 10) are **\$204,777.45**.

c. Total estimated unsecured claims are **\$204,477.45** [line 11(a) + line 11(b)].

**12. TARDILY-FILED UNSECURED CREDITORS**—All money paid by the Debtor to the Trustee under §1, but not distributed by the Trustee under § 2,3,6,7,8,9, 10, or 11 **WILL NOT BE PAID** to holders of nonpriority unsecured claims for which proofs of claim were tardily filed.

**13. OTHER PROVISIONS** — The Trustee may distribute additional sums not expressly provided for herein at the Trustee's discretion.

Debtor shall promptly notify the Trustee of the receipt of any state and federal tax refunds for the duration of this Chapter 13 case and shall be entitled to retain the first \$2,000.00 of their interest in any refunds received. Any remaining interest attributable to debtor in refunds shall be turned over to the Chapter 13 Trustee as additional plan payments. Trustee shall pay tax claims of the Internal Revenue Service for tax year 2012 pursuant to Sec. 1305.

Trustee shall make no secured payments to either Bank of America Home Loans or GMAC with regard to the real property located at 9709 Horton Ave, Urbandale, Iowa ("Horton Property"). Debtors propose to surrender the Horton Property to the secured creditors Bank of America and GMAC. Any deficiency claim filed by either creditor shall be treated by the trustee as an unsecured claim without priority.

Debtors shall pay all student loans owed to Nelnet directly and outside the plan.

**14. SUMMARY OF PAYMENTS —**

Trustee's Fee [Line 2]	\$ 7,100.00
Home Mortgage Defaults [Line 6(d)]	\$ 0.00
Claims in Default [Line 7(d)]	\$ 0.00
Other Secured Claims [Line 8(d)]	\$ 0.00
Priority Claims [Line 9(f)]	\$ 9,000.00
Separate Classes [Line 10(c)]	\$ 0.00
Unsecured Creditors [Line 11]	<u>\$54,900.00</u>
<b>TOTAL [must equal Line 1(d)]</b>	<b>\$71,500.00</b>

ATTORNEY FOR DEBTOR  
/e/ G. Martin Johnson . No.0052279)  
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12400 Portland Ave So  
#170  
Burnsville, MN 55337  
Tel: 952 881 9758  
Fax 952 881 2172  
Email: [martin@gmartinjohnson.com](mailto:martin@gmartinjohnson.com)

Signed: /s/ Todd Jeffrey Sassen  
/s/ Shannon Michele Sassen

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

In re:

Todd Jeffrey Sassen  
Shannon Michele Sassen

**SIGNATURE DECLARATION**

**Debtor(s).**

Case No. 12-41672 NCD

☐ PETITION, SCHEDULES & STATEMENTS  
☐ CHAPTER 13 PLAN  
☐ SCHEDULES AND STATEMENTS ACCOMPANYING VERIFIED CONVERSION  
☒ AMENDMENT TO PETITION, SCHEDULES & STATEMENTS  
☒ MODIFIED CHAPTER 13 PLAN  
☐ OTHER (Please describe: \_\_\_\_\_)

I [We], the undersigned debtor(s) or authorized representative of the debtor, ***make the following declarations under penalty of perjury:***

- The information I have given my attorney and provided in the electronically filed petition, statements, schedules, amendments, and/or chapter 13 plan, as indicated above, is true and correct;
- The information provided in the "Debtor Information Pages" submitted as a part of the electronic commencement of the above-referenced case is true and correct;
- **[individual debtors only]** If no Social Security Number is included in the "Debtor Information Pages" submitted as a part of the electronic commencement of the above-referenced case, it is because I do not have a Social Security Number;
- I consent to my attorney electronically filing with the United States Bankruptcy Court my petition, statements and schedules, amendments, and/or chapter 13 plan, as indicated above, together with a scanned image of this Signature Declaration and the completed "Debtor Information Pages," if applicable; and
- **[corporate and partnership debtors only]** I have been authorized to file this petition on behalf of the debtor.

Date: 6/26/12

X

Todd Jeffrey Sassen  
Signature of Debtor or Authorized Representative  
Todd Jeffrey Sassen

Todd Jeffrey Sassen  
Printed Name of Debtor or Authorized Representative

X

Shannon Michele Sassen  
Signature of Joint Debtor  
Shannon Michele Sassen  
Shannon Michele Sassen  
Printed Name of Joint Debtor

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

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In Re:

Bky File No. 12-41672 NCD  
Chapter 13

Todd Jeffrey Sassen  
Shannon Michele Sassen

Debtors

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UNSWORN DECLARATION OF SERVICE

I, G. Martin Johnson, declare under penalty of perjury that on June 22, 2012, I mailed following described documents, postage prepaid, to each of the entities named below at the address stated below for each entity: First Pre-Confirmation Modified Chapter 13 Plan

SEE ATTACHED SERVICE LIST

Dated: June 22, 2012

/e/ G. Martin Johnson  
G. Martin Johnson

**G. MARTIN JOHNSON, LTD.**  
ATTORNEY AT LAW

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G. Martin Johnson

Paralegal  
Courtney L. Johnson

June 22, 2012

TO: ALL PERSONS ON THE ATTACHED SERVICE LIST:

Re:	Todd Jeffrey Sassen and Shannon Michele Sassen
Bky File No.	12-41672 NCD
Our File No.	3081-22031RJH

Enclosed please find and herewith serviced upon you Debtors' First Pre-Confirmation Modified Chapter 13 Plan dated June 20, 2012.

Yours very truly,

/e/ G. Martin Johnson  
G. Martin Johnson  
GMJ/cj  
Enclosures

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12400 PORTLAND AVENUE SOUTH, SUITE 170, BURNSVILLE, MINNESOTA 55337  
Telephone Number (952) 881-9758 Fax Number (952) 881-2172  
Email [martin@gmartinjohnson.com](mailto:martin@gmartinjohnson.com)

ALLIANCE ONE  
4850 STREET RD. SUITE 300  
FEASTERVILLE TREVOSE PA 19053

ALLINA  
2925 CHICAGO AVE  
MINNEAPOLIS MN 55407

ALLINA HOSPITALS & CLINICS  
P.O. BOX 9125  
MINNEAPOLIS MN 55480-9125

BANK OF AMERICA  
PO BOX 650070  
DALLAS TX 75265

BANK OF AMERICA  
ATTN: BANKRUPTCY CA6-919-01-23  
400 NATIONAL WAY  
SIMI VALLEY CA 93065

BENEFICIAL FINANCE  
PO BOX 1231  
BRANDON FL 33509

BENEFICIAL FINANCE CO/HFC  
PO BOX 3425  
BUFFALO NY 14240

CAPITAL ONE  
PO BOX 60599  
CITY OF INDUSTRY CA 91716-0599

CAPITAL ONE  
P.O. BOX 30285  
SALT LAKE CITY UT 84130-0285

CITI  
CUSTOMER SERVICE  
PO BOX 6500  
SIOUX FALLS SD 57117-6500

CITI  
PO BOX 6241  
SIOUX FALLS SD 57117

CONNIE MONTOVER  
2210 EDGEBROOK  
MARSHALLTOWN IA 50158

CONSULTING RADIOLOGISTS LTD  
PO BOX 1259  
DEPT 86028  
OAKS PA 19456

GE CAPITAL RETAIL BANK  
P.O. BOX 103106  
ATTN: BANKRUPTCY DEPT.  
ROSWELL GA 30076

GMAC  
3451 HAMMOND AVE  
PO BOX 780  
WATERLOO IA 50704

HSBC BANK NEVADA, N.A.  
PO BOX 4155  
CAROL STREAM IL 60197-4155

HSBC RETAIL SERVICES/YAMAHA  
DEPT 7680  
CAROL STREAM IL 60116-7680

HSBC/ORCHARD BANK  
PO BOX 5253  
CAROL STREAM IL 60197

INTERNAL REVENUE SERVICE  
PO BOX 802501  
CINCINNATI OH 45280-2501

INTERNAL REVENUE SERVICE  
INSOLVENCY ADMINISTRATION  
BOX 7346  
PHILADELPHIA PA 19101-7346

INTERNAL REVENUE SERVICE  
ATT: INSOLVENCY UNIT STOP 5700  
30 EAST 7TH STREET, SUITE 1222  
SAINT PAUL MN 55101-4940

INTERNAL REVENUE SERVICE  
ATT: STOP 5700  
30 EAST 7TH STREET, SUITE 1222  
SAINT PAUL MN 55101-4940

KELLER JASMINE, CHAPTER 13 TRU  
12 SOUTH 6TH STREET  
SUITE 310  
MINNEAPOLIS MN 55402

KOHL'S  
PO BOX 3004  
MILWAUKEE WI 53201

MINNESOTA DEPARTMENT OF REVENUE  
PO BOX 64054  
SAINT PAUL MN 55164

MINNESOTA DEPARTMENT OF REVENUE  
MAIL STATION 4413  
SAINT PAUL MN 55146-4413

MINNESOTA DEPARTMENT OF REVENUE  
C/O COLLECTION ENFORCEMENT  
BOX 64447 551 BKY SECTION  
SAINT PAUL MN 55146

NATIONAL RECOVERY CENTER, INC  
6491 PEACHTREE INDUSTRIAL BLVD  
ATLANTA GA 30360

NCO FINANCIAL SYSTEMS  
4740 BAXTER RD  
VIRGINIA BEACH VA 23462

NELNET  
PO BOX 82561  
LINCOLN NE 68501



NELNET  
3015 SOUTH PARK ROAD  
SUITE 400  
AURORA CO 80014

NELSON, WATSON & ASSOCIATES  
80 MERRIMACK ST LOWER LEVEL  
HAVERHILL MA 01830

RIDGEVIEW MEDICAL CENTER  
500 S MAPLE ST  
WACONIA MN 55387

SASSEN, TODD AND SHANNON  
BOS 399  
WATERTOWN MN 55388

SHEFFIELD FINANCIAL CORP  
PO BOX 1704  
CLEMMONS NC 27012

SST/SUNTRUST  
4315 PICKETT RD  
SAINT JOSEPH MO 64503

STATE FARM/HOWARD GLASS  
1870 W WAYZATA BLVD  
PO BOX 756  
LONG LAKE MN 55356

TARGET  
PO BOX 673  
MINNEAPOLIS MN 55440

TARGET NATIONAL BANK  
C/O TARGET CREDIT SERVICES  
PO BOX 1581  
MINNEAPOLIS MN 55440-1581

US TRUSTEE'S OFFICE  
301 US FEDERAL COURTHOUSE  
300 SOUTH FOURTH STREET #1015  
MINNEAPOLIS MN 55415

YAMAHA/HSBC RETAIL  
PO BOX 5893  
CAROL STREAM IL 60197